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**VIA ELECTRONIC MAIL**

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Re: *U.S. v. Naser Almadaoji*

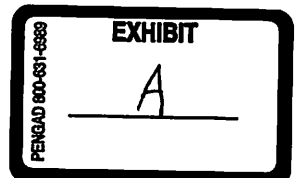
Dear Counsel:

The government anticipates calling Dr. Lorenzo G. Vidino as an expert witness at trial. The witness' qualifications are described in his enclosed CV, as well as here:

- <https://extremism.gwu.edu/dr-lorenzo-vidino>

The government anticipates that Dr. Vidino will testify on the topics of ISIS (including its various aliases), ISIS Wilayat Khorasan (including its various aliases), radicalization, the history, ideology, objectives and leadership of ISIS and ISIS Wilayat Khorasan, the relationship between ISIS and ISIS Wilayat Khorasan, areas of control of ISIS and ISIS Wilayat Khorasan, routes of travel to territory controlled by ISIS and ISIS Wilayat Khorasan, conflicts involving ISIS and ISIS Wilayat Khorasan, process of joining ISIS and ISIS Wilayat Khorasan, ISIS's and ISIS Wilayat Khorasan's recruiting efforts, and common indicators/methods of radicalization of individuals who join and attempt to join ISIS and ISIS Wilayat Khorasan. Dr. Vidino's testimony also is expected to include the following:

- that ISIS and ISIS Wilayat Khorasan are and were at the times relevant to this case designated foreign terrorist organizations. The government anticipates Dr. Vidino will explain the various iterations of ISIS, including: al Qaeda in Iraq, Islamic State of Iraq and the Levant, Islamic State, ISIL, Islamic State of Iraq and al-Sham, and Islamic State of Iraq and Syria, as well as how ISIS and ISIS Wilayat Khorasan are related, how these groups are designated, and how such designations are published. The government also anticipates Dr. Vidino will identify and discuss certain high-profile figures within terrorist organizations, including ISIS and ISIS Wilayat Khorasan, to include the leaderships of both organizations.
- that ISIS and ISIS Wilayat Khorasan engage in terrorist activity and engage and have engaged in terrorism, and that this is widely and commonly known. The government anticipates he will explain what ISIS and ISIS Wilayat Khorasan are, what they do, what they stand for, what their goals and objectives are, how they behave and act, how they



differ from, compete with, or relate to other extremist groups and entities, the types, nature, and extent of terrorist activity and terrorism they engage in, specific acts of terrorism perpetrated by them, and how and where one joins these groups, including common routes and methods of travel, common features, traits, and behaviors of those seeking to join, and common tactics and methods used to join.

- background information on organizations within the global jihadist movement, to include AQ, al-Qaeda in Iraq and ISIS, the religious and historical trends that gave rise to these groups, and these groups' goals, leadership styles and structures. More specifically, the government anticipates that Dr. Vidino will testify regarding the 2003 invasion of Iraq, the subsequent insurgency and counterinsurgency, the rise of ISIS following the Arab Spring, the conflict in Syria, ISIS's declaration of a caliphate in June 2014, its use of terrorism to further its goals of creating a caliphate, holding territory, and bringing about a confrontation with the West.
- the processes by which individuals in foreign countries, some of whom have seemingly little connection to terrorist organizations, come to act in support of those organizations. The government anticipates that Dr. Vidino will explain how the assistance and resources these persons offer benefit the organizations, how ISIS and ISIS Wilayat Khorasan have used social media, including YouTube, to disseminate propaganda, radicalize individuals, and facilitate travel for foreign fighters to territory controlled by ISIS and ISIS Wilayat Khorasan.
- physical attacks conducted or attempted by ISIS and ISIS Wilayat Khorasan and persons inspired by ISIS and ISIS Wilayat Khorasan and the specific vocabulary and imagery used by ISIS and ISIS Wilayat Khorasan supporters. This includes terms such as mujahid, caliph and caliphate, jihad, martyrdom, and dawla.
- Based on the foregoing, the government anticipates Dr. Vidino will testify concerning the meaning and significance of the evidence produced in discovery, including oral and written communications made by the defendant and others, as well as images and videos recovered from the defendant's electronic devices and internet/social-media platforms. The government anticipates that Dr. Vidino will place that evidence in the broader context of ISIS's and ISIS Wilayat Khorasan's activities during the charged period, and explain how the defendant's statements, actions, and interests are consistent with those of an individual who attempted to provide material support to ISIS and ISIS Wilayat Khorasan.

The government anticipates that Dr. Vidino will base his testimony on his years of experience, training, and research, which are also described in his enclosed CV. We have also enclosed herewith several transcripts of Dr. Vidino's testimony in different cases (including the prosecution of Laith Alebbini in the Southern District of Ohio). We will supplement this notice with other transcripts and our Office's budgetary forms reflecting the financial terms of Dr. Vidino's retention in this matter as they become available.

Additionally, absent stipulation, the government anticipates calling a translator who reviewed and approved of the translation services in this case. That translator is Jamal Kassan, FBI Language Specialist. This witness's qualifications are described in his enclosed CV. Again, absent stipulation, the government anticipates Mr. Kassan will testify that he reviewed the accuracy of all material presented in Court that was translated from Arabic into English, and that he bases his testimony on his years of experience, training, and research. Of course, our experience is that courts encourage the parties to seek to settle any differences in interpretation and reach a stipulation prior to trial (*see, e.g., United States v. Nghia Le*, 256 F.3d 1229, 1238 (11th Cir. 2001) ("Initially, the district court and the parties should make an effort to produce an 'official' or 'stipulated' transcript, one which satisfies all sides."). To that end, we are happy to sit down with you to fulfill this mandate to the extent any differences are identified.

Finally, the government anticipates calling FBI Special Agent Todd Vokas as the forensic examiner who performed data extraction services in this case from seized electronic devices, including a Samsung cellular telephone and iView tablet. Special Agent Vokas will testify to matters related to the extraction of information from those devices, including the means used to extract the information, the recovery of both active and deleted information from the electronic devices (including files viewed via the internet found in temporary internet directory or "cache"), and the recovery of "user attribution" evidence from these electronic devices.

As you are aware, trials and trial preparation are fluid and constantly evolving. We accordingly reserve the right to supplement, update, or otherwise modify this expert witness disclosure. If such a need arises, we will provide the requisite notice under Rule 16(a)(1)(G) as soon as reasonably available.

The government has previously requested all reciprocal discovery to which it is entitled under Rules 16(b) and 26.2 of the Federal Rules of Criminal Procedure. The government reiterates these requests, which includes, but is not limited to, the matters set forth in Rule 16(b)(1)(C).

Very truly yours,

VIPAL J. PATEL  
Acting United States Attorney



DOMINICK S. GERACE  
Assistant United States Attorney

Enclosures